

November 6, 2006

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Ms. Susan M. White Minerals Regulatory Program Coordinator Utah Division of Oil Gas and Mining P.O. Box 145801 Salt Lake City, Utah 84114-5801

Re: Response to Division Letter and Comments of October 27, 2006; Brush Resources, Inc. (BRI), Topaz Mine, Juab County, Utah; M/023/003

Dear Ms. White:

I am submitting this letter and the attached response on behalf of BRI and at their request. Responses are shown in italics and labeled "reply" on the attached version of the Division's comments. Accompanying the response document are the revised reclamation cost estimating spreadsheets. In addition, section 9.0 of the Mining and Reclamation Plan (MRP) has been revised to reflect minor changes in subsections 9.2.1 and 9.14. A copy of section 9.0 showing these changes in redline is attached.

Based upon conversations between Mr. Jensen and Mr. Bill Fuller of JBR, we believe that we understand and have satisfactorily addressed all of the Division's October 27, 2006 comments. Accordingly, we believe that the Division should now be in the position to grant tentative approval of BRI's Notice of Intent and MRP Amendment.

On behalf of BRI, I request that the Division expedite its issuance of a letter of tentative approval of BRI's Notice of Intent to Amend its Mining and Reclamation Plan for the Topaz Mine, Juab County, Utah; M/023/003. In the letter, please confirm the total amount of surety (which has been recalculated as \$1,362,000) so that BRI can immediately set about modifying its letter of credit and completing the Reclamation Contract for the Division's review and approval. As you are aware, BRI's schedule for commencing mining operations under the amended MRP has advanced due to market conditions and pre-stripping is currently scheduled to commence in early January 2007.

Please contact either Mr. John Wagner of BRI or me with any questions you may have regarding this letter or the accompanying documents. We would appreciate any such questions being raised by telephone and not through a formal exchange of letters. Your expedited response will be greatly appreciated.

Sincerely

Robert J. Bayer Managing Principal

Cc: Alex Boulton, BRI John Wagner, BRI NOV 0 7 2006
DIV. OF OIL, GAS & MINING

Fourth Review Page 1 of 2 M/023/003 October 27, 2006

FOURTH REVIEW OF NOTICE OF INTENTION TO COMMENCE LARGE MINING OPERATIONS

Brush Resources, Inc. Topaz Mine

M/023/003 October 27, 2006

R647-4-113 - Surety

The Division does not agree with the rental rates used in calculating the surety for this project. The following are the rates used by the Division; these costs are from the Rental Rate Blue Book, Second Half 2006 and Means Heavy Construction Data, 2006 version.

D9 dozer – w/operator \$323.13/hr - Rental Rate Blue Book (pg 9-50).

Labor rate from Means -Crew 10B – Equip Op (med)

hourly cost.

Cat 631G scraper – w/operator \$380.25/hr – Rental Rate Blue Book, (pg 9-47).

Labor rate from Means-Crew 10B - Equip op (med)

hourly cost.

Cat 992G loader – w/operator \$530.80/hr – Rental Rate Blue Book, (pg 9-34).

Labor rate from Means - Crew 10B- Equip Op (med)

hourly cost

8 cu yd dump truck – w/operator \$89.15/hr – Rental Rate Blue Book, (pg 20-11)

Labor rate from Means – Crew B-34B- Truck Driver

(heavy)

REPLY – The Rental Rate Blue Book and Means Heavy Construction Data rates have been incorporated in the cost estimate, resulting in a revised reclamation cost estimate.

Equipment Mob/Demob shows the mobilization of a backhoe that is not shown on the equipment hourly rate portion of the estimate.

Please indicate the size of this backhoe for surety calculation purposes.

REPLY – A backhoe with a hydraulic attachment was assumed to be used in the demolition component of the surety estimate. Demolition costs are derived from Means 2006.

The Equipment Mob/Demob should show the mob/demob of the 992G loader.

REPLY - This has been added to the Mob/Demob cost component.

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The estimate show that 121.6 acres of the area will be deep ripped but the revegetation section of the estimate only indicates that 107.6 acres will be seeded.

Please explain why the additional 14 acres deep ripped will not be seeded.

REPLY - This has been corrected to show that 121.6 acres will be revegetated.

The surety estimate indicates that the landfill area will be regraded, waste material placed and top soiled.

There is no indication that this area will be revegetated. Please explain why this 7.7 acre area is not scheduled to be revegetated.

REPLY - The 7.7 acres has been added to the revegetation cost calculation.

Please indicate where in the area there will be enough fine waste material that a self loading scraper will be able to load 62113 cy.

The surety calculation indicates that utilizing 631G scraper loads to be moved will be 34 cy. This scraper normally carries 24 cy (struck) to 34 cy (heaped) scraper, (using an average load of 29 cy). The scraper production rate should be adjusted to reflect this average loading rate.

REPLY – Sufficient material is available immediately west of the landfill near the Roadside 2 backfilled area. The average load of 29 cy has been incorporated in the cost calculation.

It will take 2141 trips to move 63,113 cu yds of waste material. The time allotted in the surety to move this material is 201.8 hours. This would seem to be an ambitious schedule considering the irregular sizes of the material to be moved. The Division feels that a cycle time of less than 6 minutes/load is not possible, considering the aggregate sizes of the material and the fact that the surface from which this material is removed is compacted. Please review this production rate.

REPLY – All productivity factors were taken from the 36th edition of the Caterpillar Performance Handbook. Because of the proximity of the waste rock to the landfill, Brush submits that these factors are reasonable and prudent.

Note: The use of a self-loading scraper to harvest rock from a dump which normally contains large rocks which could damage the auger on the scraper. If this scraper is to be used, another piece of equipment may be necessary to remove these larger rocks before the scraper attempts to load from this area. The use of a 637G scraper could be considered. This scraper has similar load rating to the 631G scraper but requires the use of a push dozer.

REPLY - Brush is currently utilizing a self loading Cat 633 scraper (an older model not listed in the current Cat handbook). Using the 631 productivity numbers was a conservative estimate. The material was originally placed using this scraper. Reclamation work would just be reversing the process and is considered very feasible.

RECLA	MATION COST SUMMARY - EXISTING	Example 1	Existing		Phase I	
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9.3	Facilities Demolition & Disposal		\$	69,933	\$	-
9.4	Regrading & Recontouring		\$	5,799	\$	4,96
9.5	Ripping		\$	52,075	\$	53,48
9.6	Drainage Stabilization and Restoration	N/A				
9.7	Topsoil Replacement		\$	150,426	\$	118,45
					4	,
9.8	Seedbed Preparation		\$	54,720	\$	106,78
9.9	Revegetation		\$	103,198	\$	194,89
9.10	Pit Highwall Safety Berms & Fences	N/A				
9.11	Miscellaneous - Land Fill Reclamation		\$	116,998	\$	8,00
9.12 I	RECLAMATION TOTAL		\$	553,149	\$	486,58
9.13 F	Reclamation Supervision(10% of Reclamation	on Total)	\$	55,315	\$	48,65
9.14	SUBTOTAL (1)		\$	608,464	\$	535,24
9.15 (Contingency (10%)		\$	60,846	\$	53,52
9.16	SUBTOTAL (2)		\$	669,310	\$	588,77
9.17 E	Escalation (for 5 years at 1.6% per year)		\$	55,285	\$	48,63
9.18	GRAND TOTAL		\$	724,595	\$	637,40
C	GRAND TOTAL ROUNDED		\$	724,600	\$	637,40
OTAL F	RECLAMATION LIABILITY					
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1	Lunch room		8		blocks			
+	Core shed #1	504	8		blocks			
+	Core shed #2	240	8		blocks	1,400	F	y Brown
+		240	8		blocks	The same		
+	Bunk house	672	8		blocks	100 110		
	Guard qtrs	718	8		blocks			
1	Generator shed	180	8	1440	concrete	1 7 6		
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12	TOTAL ACRES ALL	L RIPPING		121.6	1000	And the second	1875		
9.6	Drainage Stabiliza	tion and Restora	ation						
9.7	Topsoil Replacem	ent			7 81 1	24.2	1		1
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	The same of the sa	Dump Backfill&	haul distance	Ore Stockpile	Э	haul distance			Dump Backfill8
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	Name and the second		The Block	7-4-4		19 37			
	Monitor ore pad	5405	1200		0		100		
Full	Monitor dump/bkfl	10971	1200		0			1000	
	Dust Suppression	766	1200						
	Roadside 2 bkfill	403	900		31 1 128	1			34436
	Roadside/Fluro 3	6816	900	(C. 16.)	0				-14-30
la la	Mine Camp	3469	2400		7 (7)				
	Laydown area	1855	2400		97/	August Sa			
	Rainbow pit 2	8712	2400		1,00				
	Blue Chalk/Sec 16	10648	6200						
					22 mg 2				
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	TOTALS	49045	2249	0	0 0		49045	2249	
	NOTE: ALL HAUL	DISTANCES API					Tall Later		
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716		1000		Dump Backfill&	1000	Ore pads			
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9.10	Pit Highwall Safet	ty Berms	- stud						
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4	Total length Safety	/ Berm	0		forming.			10.17	
10/5			100						100,00
9.1	1 Miscellaneous - L		tion						
	Land fill = 7.7 acre		43 5 7						1
h.V.	Item	area(ac)	height (ft)	volume (cu yd)		100		March 1	4-34-33
	grading	7.7		621					
1.6	waste rock					_			
	top soil	7.7		62113	3				
		7.7		62113	3				
				62113	3				
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		7.7		62113	3				
	Topsoil Requiren	7.7	0.5	62113	3				
		7.7	Topsoil reqd	6211: 6 621:	3				
	Topsoil Requiren Area Monitor ore pad	7.7 ments acres 13.4	Topsoil reqd Cu Yds	6211:	3				
	Topsoil Requiren	7.7	Topsoil reqd Cu Yds	6211:	3				
	Topsoil Requiren Area Monitor ore pad Monitor dump/ backfill	7.7 ments acres 13.4 27.2	Topsoil reqd Cu Yds 5405 2 10971	6211	3				
	Area Monitor ore pad Monitor dump/ backfill Dust Suppression	7.7 ments acres 13.4 27.2	Topsoil reqd Cu Yds 5405 2 10971	6211	3				
	Area Monitor ore pad Monitor dump/ backfill Dust Suppression water assembly	7.7 ments acres 13.4 27.2	Topsoil reqd Cu Yds 5405 2 10971	6211:	3				
	Area Monitor ore pad Monitor dump/ backfill Dust Suppression water assembly Roadside 2	7.7 ments acres 13.4 27.2	Topsoil reqd Cu Yds 5405 2 10971	6211:	3				
	Topsoil Requiren Area Monitor ore pad Monitor dump/ backfill Dust Suppression water assembly Roadside 2 backfill	7.7 ments acres 13.4 27.2 1.6	Topsoil reqd Cu Yds 4 5405 2 10971 9 766	6 6211	3				
	Topsoil Requiren Area Monitor ore pad Monitor dump/ backfill Dust Suppression water assembly Roadside 2 backfill Roadside/Fluro 3	7.7 nents acres 13.4 27.2 1.6	Topsoil reqd Cu Yds 5405 2 10971 3 766	6211	3				
	Topsoil Requiren Area Monitor ore pad Monitor dump/ backfill Dust Suppression water assembly Roadside 2 backfill Roadside/Fluro 3 Mine Camp	7.7 nents acres 13.4 27.2 1.5 1.6 8.6	Topsoil reqd Cu Yds 5405 2 10971 2 766 0 403 9 6816 5 3468	6 6211: 6 621: 6 621:	3				
	Topsoil Requiren Area Monitor ore pad Monitor dump/ backfill Dust Suppression water assembly Roadside 2 backfill Roadside/Fluro 3 Mine Camp Laydown area	7.7 nents acres 13.4 27.2 1.5 1.6 8.6 4.4	70psoil reqd Cu Yds 54052 10971 766	6 6211: 6 621:	3				
	Topsoil Requiren Area Monitor ore pad Monitor dump/ backfill Dust Suppression water assembly Roadside 2 backfill Roadside/Fluro 3 Mine Camp Laydown area Rainbow pit 2	7.7 nents acres 13.4 27.2 1.5 1.6 8.6	70psoil reqd Cu Yds 54052 10971 766	6 6211: 6 621:	3				
	Topsoil Requiren Area Monitor ore pad Monitor dump/ backfill Dust Suppression water assembly Roadside 2 backfill Roadside/Fluro 3 Mine Camp Laydown area Rainbow pit 2 ore pad, ramps	7.7 ments 13.4 27.2 1.6 16.8 8.6 4.6 21.8	Topsoil reqd Cu Yds 1 5405 2 10971 3 766 0 403 0 6816 6 3466 6 1855 6 8712	6 6211 6 621 6 621 6 6 7 6 7 6 8 7 6 8 7 6 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9	3				
	Topsoil Requiren Area Monitor ore pad Monitor dump/ backfill Dust Suppression water assembly Roadside 2 backfill Roadside/Fluro 3 Mine Camp Laydown area Rainbow pit 2	7.7 nents 13.4 27.2 1.5 1.6 8.6 4.6 21.6 26.4	Topsoil reqd Cu Yds 5405 10971 0 766 0 403 6 1855 6 8712 4 10648	6 6211: 6 621: 6 621: 6 63: 7 7 8 8 8 8	3				
	Topsoil Requiren Area Monitor ore pad Monitor dump/ backfill Dust Suppression water assembly Roadside 2 backfill Roadside/Fluro 3 Mine Camp Laydown area Rainbow pit 2 ore pad, ramps	7.7 ments 13.4 27.2 1.6 16.8 8.6 4.6 21.8	Topsoil reqd Cu Yds 5405 10971 0 766 0 403 6 1855 6 8712 4 10648	6 6211: 6 621: 6 621: 6 63: 7 7 8 8 8 8	3				
	Topsoil Requiren Area Monitor ore pad Monitor dump/ backfill Dust Suppression water assembly Roadside 2 backfill Roadside/Fluro 3 Mine Camp Laydown area Rainbow pit 2 ore pad, ramps Sec 16 Dump	7.7 nents 13.4 27.2 1.5 1.6 8.6 4.6 21.6 26.4	Topsoil reqd Cu Yds 5405 10971 0 766 0 403 6 1855 6 8712 4 10648	6 6211: 6 621: 6 621: 6 63: 7 7 8 8 8 8	3				
	Topsoil Requiren Area Monitor ore pad Monitor dump/ backfill Dust Suppression water assembly Roadside 2 backfill Roadside/Fluro 3 Mine Camp Laydown area Rainbow pit 2 ore pad, ramps Sec 16 Dump	7.7 nents 13.4 27.2 1.5 1.6 8.6 4.6 21.6 26.4	Topsoil reqd Cu Yds 5405 10971 0 766 0 403 6 1855 6 8712 4 10648	6 6211: 6 621: 6 621: 6 63: 7 7 8 8 8 8	3				
	Topsoil Requiren Area Monitor ore pad Monitor dump/ backfill Dust Suppression water assembly Roadside 2 backfill Roadside/Fluro 3 Mine Camp Laydown area Rainbow pit 2 ore pad, ramps Sec 16 Dump	7.7 nents 13.4 27.2 1.5 1.6 8.6 4.6 21.6 26.4	Topsoil reqd Cu Yds 5405 10971 0 766 0 403 6 1855 6 8712 4 10648	6 6211: 6 621: 6 621: 6 63: 7 7 8 8 8 8	3				

DOZING					
Dump Top Rounding & Topsoil	Spreading	Ripping		Seed Setting with D-9 pulling D	impler
D-9	70' Push	D-9		D-9	
Production				Production	
Dozing distance	70	Ripper width (ft)	10.0	Dippler width (ft)	11.0
Maximum production(lcy/hr)	1600	Ripper penetration (ft)	2	speed (mi/hr)	1.00
		speed (mi/hr)	1.00		
Correction Factors			year in the second		
Operator	0.75	Maximum production(ac/hr)	1.21	Maximum production(ac/hr)	1.33
efficiency (50 min/hr)	0.83	Correction Factors	13	Correction Factors	
		Operator	0.75	Operator	0.75
Total Correction Factor	0.623	efficiency (50 min/hr)	0.83	efficiency (50 min/hr)	0.83
Corrected Production		Total Correction Factor	0.623	Total Correction Factor	0.623
(lcy/hr)	996				
(·-)····/	and the second second	Corrected Production	0.75	Corrected Production	0.83
	Anguage the things	(ac/hr)		(ac/hr)	

SCRAPERS		Section 1	
Top Soil Replacement			
Cat 631		1 10	
Capacity (cu yd)	27.758	29	18.62
Average Haul Distance		4500	
Cycle Time			
Loading time (min)	- Ed 12	0.9	A COLUMN TO THE PARTY OF THE PA
Spreading time (min)	an Mas 12	0.7	
Loaded Haul time (min)	4% grade	2.8	
Empty Haul time (min)	4% grade	1.9	Part of the second
Cycle Time (min		6.3	
Cycles per Hour	- 40	9.6	
Production Rate (lcy/hr)	3.26 (2.16)	278	
Correction Factors			
Operator		0.75	
Job Efficiency(50 min/hr)	1 1 1 1 1 1	0.83	
Load Factor		0.8	
Total Correction Factor		0.50	
Corrected production rate(cy/hr)		139	

3-1		
7.24.7.21	29	
74.75	1300	A. A
	0.9	
	0.7	
4% grade	1.0	
4% grade	0.7	
	3.3	
3/4	18	
1 180	527	10 0 11
	0.75	
	0.83	
	0.8	
38.650	0.50	
	263	
		1300 0.9 0.7 4% grade 1.0 4% grade 0.7 3.3 18 527 0.75 0.83 0.88 0.50

Equipmer	nt Hourly R	ates		THE SECOND	11111111111	A CONTRACTOR
- 1460		THE STREET, MICH.			Total Hou	ırly
Item					Cost	I
D9 Dozer						
Cat 631 G	Coroner	_			267.73	and the second s
Cat 992G	Scraper				324.85	
8 Cu Yd D					475.40	
o cu lu D	T Tuck				45.85	5
Total Hour	v Costs from	m Rental Rat	to Book 2	006 per DOGM		
	1, 00010 1101	Thental Nat	T BOOK, 20	T DOGW	comments	
Labor Hou	Irly Rates					
Operator	Des	FICA	Unemploy	Wkmn Comp		181
Operator	Base	7.65%	3.00%	6 12.30%		Total (\$)
Scraper						
Dozer	100				2.76	55.40
Loader				The state of the s		55.40
Haul Truck		1000				55.40
	15 P. 15	777				43.30
			a de		91.45 J. 37 J. 1	
Base labor i	rates are fro	m Means, 20	006 per D0	OGM comment	S	
				1 1888		
Revenetation	on Sood Ca	ost per Acre				
toregetation	Jii Seed Co	St per Acre				W 186
Species	17-17-515		lbs/acre	\$/lb		¢ nor core
crested whe	atgrass		3.0	3.00		\$ per acre 9.00
squirreltail	17:16		2.0	35.00		70.00
ndian Riceg	rass		2.0	6.00		12.00
ellow Swee	etclover		0.5	2.00	71 TA	1.00
Black Sage			0.1	100.00		10.00
Palmer's Per			1.0	60.00		60.00
our-wing Sa	aitbrush		1.0	12.00		12.00
Shadscale			1.0	18.00		18.00
			10.6			192.00
eed Costs t	from Granite	e Seed, Lehi,	UT. (8/14	(06)	20.0	192.00

9.3	Facilities Demolition & Disposal		0
9.4	Regrading & Recontouring		4962
9.5	Ripping		53488
9.6	Drainage Stabilization and Restoration	N/A	
9.7	Topsoil Replacement		118455
9.8	Seedbed Preparation		106785
9.9	Revegetation		194898
.10	Pit Highwall Safety Berms & Fences	N/A	
.11	Miscellaneous - Mobilization & Demobilization		8000
.12	RECLAMATION TOTAL		486588
.13	Reclamation Supervision(10% of Reclamation Total	al)	48659
.14	SUBTOTAL (1)		535246
.15	Contingency (10%)		53525
.16	SUBTOTAL (2)		588771
.17	Escalation (for 5 years at 1.6% per year)		48632
.18	GRAND TOTAL		\$ 637,404
	GRAND TOTAL ROUNDED		\$ 637,400

9.3	Facilities D	emolition &	Disposal		- 4		1.50	1647 18 30		1
3.0	. aominios D	- Indiana	_ lopooul							
		Metal Structu	ures							
				unit cost	T V S Y Y	30, 11			Cost	No.
10.00		volume(cuft)		(\$/cuft)				3757 Feb.		
		0		0.26					0	
2.85			Tvasa 1.	Means 2006 (02220-110-0	012)	784			
	e e e e e e e e e e e e e e e e e e e				- 15 m (r					
		Frame and T	in Structur	es						
				unit cost						
		volume(cuft)	1 1	(\$/cuft)		70.75				
		0		0.28					0	
				Means 2006 (02220-110-0	100)				
						12 13 1 1 22				
	0"	Pads		0/						
	6"	area (sq ft)		\$/sq ft				2 2 2 2 2 2		
		0		5.60 Means 2006 (00000 400 0	420)			0	
		The Control of the Co	38	ivieans 2006 (UZZZU-13U-U	42U)		72.9		
	Δ"	area (sq ft)		\$/sq ft			100			
	-	0		4.02					0	
		U		Means 2006 (280)		100	0	
				11.00110 2000 (TOTAL FAC		DISPOSA	AI.	0	10 to
			25		TOTALTAC	TETTILO AIVI	DIGI 00/	\	9	
9.4	Regrading	& Recontou	ring				152.0	7 112		
	J9	10 - 100 10 10 1		are than to	9.5			175	100	
		Dump Top R	ounding						100 C 10	
					production		equip	labor		
	ed her a	length (ft)	area(sq ft)	volume(cuyd)	lcy/hr	total hrs	\$/hr	\$/hr		
		10867	38		996	15.4	267.73	55.40	4962	
				mp Top Round	ling		Kara ne			
				for area cross				9	2500	
			section			200				
_										
9.5	Ripping				1 6			Literatura		
1 10					production		equip	labor		
			area (ac)		acres/hr	total hrs	\$/hr	\$/hr	50400	
-			124.9	L L RIPPING AS	0.75		267.73	55.40	53488	
			NOTE: AL	L KIFPING AS	SOMED DEF		776-7			
9.6	Drainage S	tabilization a	and Restor	ation		N/A				-
5			a restol							4
0 =	Topsoil Re	placement				- 15-		1 6		
9.7		importing	volume		production		equip	labor		General A
9.7						I and the second second	4	\$/hr		No.
9.7				William To	lcy/hr	total hrs	\$/hr	Φ/111		
9.7		w/ scraper	(cuyd) 60806		lcy/hr 234	total hrs 259.6	\$/hr 324.85	55.40	98728	
9.7		w/ scraper	(cuyd)		234				98728	
9.7		w/ scraper spreading	(cuyd)		234 production	259.6	324.85 equip	55.40 labor	98728	
9.7		w/ scraper	(cuyd) 60806 volume (cuyd)		234 production lcy/hr	259.6 total hrs	324.85 equip \$/hr	55.40 labor \$/hr		
9.7		w/ scraper spreading	(cuyd) 60806 volume		production lcy/hr 996	259.6 total hrs 61.1	324.85 equip \$/hr 267.73	55.40 labor	19727	
9.7		w/ scraper spreading	(cuyd) 60806 volume (cuyd)		production lcy/hr 996	259.6 total hrs	324.85 equip \$/hr 267.73	55.40 labor \$/hr		
		w/ scraper spreading by dozer	(cuyd) 60806 volume (cuyd)		production lcy/hr 996	259.6 total hrs 61.1	324.85 equip \$/hr 267.73	55.40 labor \$/hr	19727	
	Seedbed P	w/ scraper spreading by dozer	(cuyd) 60806 volume (cuyd)		production lcy/hr 996 TOTAL TOF	total hrs 61.1 SOIL REPL	324.85 equip \$/hr 267.73	55.40 labor \$/hr	19727	
		w/ scraper spreading by dozer	(cuyd) 60806 volume (cuyd) 60806		production lcy/hr 996 TOTAL TOF	total hrs 61.1 SOIL REPL manure	324.85 equip \$/hr 267.73	55.40 labor \$/hr	19727	
		w/ scraper spreading by dozer	(cuyd) 60806 volume (cuyd) 60806		production lcy/hr 996 TOTAL TOF fertilizing \$/ac	total hrs 61.1 SOIL REPL manure \$/ac	324.85 equip \$/hr 267.73 ACEMENT	55.40 labor \$/hr	19727 118455	
		w/ scraper spreading by dozer	(cuyd) 60806 volume (cuyd) 60806		production lcy/hr 996 TOTAL TOF	total hrs 61.1 SOIL REPL manure \$/ac 350	324.85 equip \$/hr 267.73 ACEMENT	55.40 labor \$/hr	19727	

Revegetat	ion		Sept.					
	1 - 1/20/100	application	seed cost		10 m			See As
seed	area (ac)	\$/ac	\$/ac				1	
	237.3	240	192.00	K. 1. 170	1 13		102513.6	
		DOGM rate	quote	The state of the s				
						labor		
			-					SY 125
dimpling							00004	
PER L	237.3	19 No. 4 1 19				55.40		
	7		TOTAL REV	/EGETATIO	N		194898	
Dit Highw	all Safety Berms							
Fit Highw	all Salety Defilis		-					
	length (ft)	NOTE: Safet	y berms are ir	stalled durir	ng initial pha	ase of	1.00	798
	19650	of mir	ning of a giver	pit. Berm co	onstruction	is an		
		oper	ational cost ar	nd not a recla	amation cos	st.		
		The s	afety berms a	re a MSHA	requiremen	t		
Miscellan	eous - Mob/Demob				1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			
				The second	10.5			
Equip Mob	D/Demob		mal sa Ping	16.0			4-1-1-1-1	
	D0 1	200						
The Cartie								
P\$ 1.00			U					
Section 19								
	992 loader						8000	
91 dir +3		TOTAL MOE	B/DEMOB		1.77		8000	
Mr. Ar Line					-		8000	No. 2
	dimpling Pit Highwa	dimpling area (ac) 237.3 Pit Highwall Safety Berms length (ft) 19650 Miscellaneous - Mob/Demob Equip Mob/Demob D9 dozer 631 scraper backhoe	application seed area (ac) \$/ac 237.3 240 DOGM rate DOGM rate DO	application seed cost	application seed cost	application seed cost seed se	application seed cost seed se	application seed cost

NA-4-1	THE PERSON OF				100000		
Metal structures							16.
Maint. Shop	area(sqft)	height (ft)	volume(cuft)	foundation	THE YEAR		
Welding Shop	2400			concrete			Tage 1
Sample storage	1152			concrete			
Sample storage	SUBTOTAL 880	10	0000	concrete		Asset S	
The second secon	SUBTUTAL	100	C	cu ft			
Frame & tin stru	ictures					- 1	
Shop addition	4070					V. 19	W
Pump house	1078			concrete			
Prod. office	160			concrete			
Engr. Office	500 1012			blocks	100000000000000000000000000000000000000		
Lunch room	504			blocks			
Core shed #1	240			blocks			
Core shed #2	240			blocks		1000	The state
Bunk house	672			blocks	The Control		
Guard qtrs	718	8		blocks	1 1 1 1 1 1		
Generator shed	180			blocks			
The state of the s	SUBTOTAL	8		concrete		172.5	
East 1 No. 1	- TO IAL		0	cu ft			
Pads					The second		
6" depth pads	Table Pull red 1		4" depth pads		137 433		the second
Tank farm	1315		Welding shop	1152	Secretary Secretary		
generator pad	419		Sample bldg	880			
Maint. Shop	2400						
Total sqft 6"pads	0		Total sqft 4"pads	0			
		Contraction of	rotar oqit 4 pada	U			
	Account without and	4.0	SERVICE TO	W 12 1		2.44	
ELECTIVE SEASON							
Regrading & Re	contouring		The second second				
	contouring						
(I.e. Dump Top R	Rounding)						
(I.e. Dump Top R	Rounding)						
(I.e. Dump Top R	Rounding) Pit		Linear feet				
(I.e. Dump Top R	Pit Designation	Designation	to be rounded				
(I.e. Dump Top R Property Fluro	Pit Designation	Designation n/a	to be rounded 481				
(I.e. Dump Top R Property Fluro Fluro	Pit Designation 1	Designation n/a n/a	to be rounded 481 296				
Property Fluro Fluro Fluro Fluro	Pit Designation 1 2	Designation n/a n/a n/a	to be rounded 481 296 212				
(I.e. Dump Top R Property Fluro Fluro Fluro Rainbow	Pit Designation 1 2 3 1	Designation n/a n/a n/a n/a	to be rounded 481 296 212 3495				
Property Fluro Fluro Fluro Rainbow Rainbow	Pit Designation 1 2 3 1 1	Designation n/a n/a n/a n/a 1	to be rounded 481 296 212 3495 559				
Property Fluro Fluro Fluro Rainbow Rainbow Rainbow	Pit Designation 1 2 3 1 1 2	Designation n/a n/a n/a n/a 1 2	to be rounded 481 296 212 3495 559 1424				
Property Property Fluro Fluro Rainbow Rainbow Rainbow Rainbow Rainbow	Pit Designation 1 2 3 1 1	Designation n/a n/a n/a n/a 1	to be rounded 481 296 212 3495 559 1424 1211				
Property Fluro Fluro Fluro Rainbow Rainbow Rainbow	Pit Designation 1 2 3 1 1 2	Designation n/a n/a n/a n/a 1 2	to be rounded 481 296 212 3495 559 1424				
Property Fluro Fluro Rainbow Rainbow Rainbow Rainbow Rainbow South Wind	Pit Designation 1 2 3 1 1 2 3	Designation n/a n/a n/a 1 2 2	to be rounded 481 296 212 3495 559 1424 1211 3189				
Property Property Fluro Fluro Rainbow Rainbow Rainbow Rainbow Rainbow	Pit Designation 1 2 3 1 1 2 3	Designation n/a n/a n/a 1 2 2	to be rounded 481 296 212 3495 559 1424 1211				
Property Fluro Fluro Rainbow Rainbow Rainbow Rainbow Rainbow South Wind	Pit Designation 1 2 3 1 1 2 3	Designation n/a n/a n/a 1 2 2	to be rounded 481 296 212 3495 559 1424 1211 3189				
Property Fluro Fluro Rainbow Rainbow Rainbow Rainbow Rainbow South Wind	Pit Designation 1 2 3 1 1 2 3	Designation n/a n/a n/a 1 2 2	to be rounded 481 296 212 3495 559 1424 1211 3189				
Property Fluro Fluro Rainbow Rainbow Rainbow Rainbow Rainbow South Wind	Pit Designation 1 2 3 1 1 2 3	Designation n/a n/a n/a 1 2 2	to be rounded 481 296 212 3495 559 1424 1211 3189				
Property Fluro Fluro Fluro Rainbow Rainbow Rainbow Rainbow South Wind TOTAL LENGTH	Pit Designation 1 2 3 1 1 2 3	Designation n/a n/a n/a 1 2 2	to be rounded 481 296 212 3495 559 1424 1211 3189				
Property Fluro Fluro Rainbow Rainbow Rainbow Rainbow Rainbow South Wind	Pit Designation 1 2 3 1 1 2 3	Designation n/a n/a n/a 1 2 2	to be rounded 481 296 212 3495 559 1424 1211 3189				
Property Fluro Fluro Rainbow Rainbow Rainbow Rainbow Rainbow TOTAL LENGTH	Pit Designation 1 2 3 1 1 2 3 (FT) ROUNDING	Designation n/a n/a n/a 1 2 2 1	to be rounded 481 296 212 3495 559 1424 1211 3189				
Property Fluro Fluro Fluro Rainbow Rainbow Rainbow Rainbow South Wind TOTAL LENGTH	Pit Designation 1 2 3 1 1 2 3 (FT) ROUNDING	Designation n/a n/a n/a 1 2 2 1 Stockpiles)	to be rounded 481 296 212 3495 559 1424 1211 3189				
Property Fluro Fluro Rainbow Rainbow Rainbow South Wind TOTAL LENGTH Ripping Shallow Surface F	Pit Designation 1 2 3 1 1 2 3 (FT) ROUNDING	Designation n/a n/a n/a 1 2 2 1 Stockpiles)	to be rounded 481 296 212 3495 559 1424 1211 3189 10867				
Property Fluro Fluro Rainbow Rainbow Rainbow South Wind TOTAL LENGTH Ripping Shallow Surface F Property Fluro	Pit Designation 1 2 3 1 1 2 3 (FT) ROUNDING	Designation n/a n/a n/a 1 2 2 1 Stockpiles)	to be rounded 481 296 212 3495 559 1424 1211 3189 10867				
(I.e. Dump Top R Property Fluro Fluro Fluro Rainbow Rainbow Rainbow South Wind TOTAL LENGTH Ripping Shallow Surface F Property Fluro Rainbow	Pit Designation 1 2 3 1 1 2 3 (FT) ROUNDING	Designation n/a n/a n/a 1 2 2 1 Stockpiles)	to be rounded 481 296 212 3495 559 1424 1211 3189 10867				
Property Fluro Fluro Rainbow Rainbow Rainbow South Wind TOTAL LENGTH Ripping Shallow Surface F Property Fluro	Pit Designation 1 2 3 1 1 2 3 (FT) ROUNDING	Designation n/a n/a n/a 1 2 2 1 Stockpiles)	to be rounded 481 296 212 3495 559 1424 1211 3189 10867				
(I.e. Dump Top R Property Fluro Fluro Fluro Rainbow Rainbow Rainbow South Wind TOTAL LENGTH Ripping Shallow Surface F Property Fluro Rainbow	Rounding) Pit Designation 1 2 3 1 1 2 (FT) ROUNDING	Designation n/a n/a n/a 1 2 2 1 Section 1 Stockpiles)	to be rounded 481 296 212 3495 559 1424 1211 3189 10867				

Property		Ore pad(ac)	roads (ac	1	dumps(ac)	h L CU /	ALC: NO.			
Fluro 1				5.4	dumps(ac)	backfills(ac)				
Fluro 2		177.00	.0	5.4	No.		.1		13	
Fluro 3			Airs.	-	APPENDED IN		.1	1 - Aut - A	11 31 31	- 100mm X 3x
Rainbow	1	10	0.6	-		2	.3	THE RESERVE		
Rainbow 2	2	12	0.5	9.8	14.6	6	and the second	7		
Rainbow 3		1.79	163 / 5	75.00	7.6	6				
South Win	3	A STATE OF STREET			29.7	7				
		2	.5	4.7	10.9	9		7 8 dr 400 c		
Mine Cam	np		The second second	29			-	0	the Tales of	
TOTAL		22	.6 19	9.9	62.8		8.			
			4 7	-	02.0	9.	5 8.	6		
TOTAL AC	CRES [DEEP RIPPING	G		400.4					
TOTAL AC	CRES A	ALL RIPPING			123.4		4			
		No. of the last of		-	124.9	THE PARTY OF THE	The second	400 4750	THE STATE OF THE S	
0.6 Drainage	Stabili	zation and Re	storation		Curs Con			197	Transfer at	
0.7 Topsoil Re	Poplace									
./ Topson Re		95	one way		A S				100	150.3
100	1000	Dump Backfill&	& haul distant	00	Oro Ctoolsoil		one way	Lip me	one way	DOWN MEN.
Mine	The second	outslope (yds)	(ft)	_	Ore Stockpile		haul distance		haul distance	Dump Back
	E E	(yus)	(IL)	(a	c)	(yds)	(ft)	(yds)	(ft)	outslope (ac
Fluro 1/2/3	3	16828	0	-	() 医经验证 () 第二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十				1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	satisfie (at
Rainbow 1					7.5	3025	5400		100	
Rainbow 1		8072			12.6	5082	2700		93.95	3
		8266			C. L. St. Bry	2 3 10 20 1	2,00			1
Rainbow 3		9320			ALCOHOLD TO THE	tree				2
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	2514			Du	mp Backfill&		stockpiles			
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TOTAL ACF	RES TO	D BE REVEGE BY Berms (map)	TATED	Du	mp Backfill&		stockpiles			
Pit Highwall Mine Fluro 1/2/3	RES TO	D BE REVEGE by Berms (map)	actual length (ft)	Du	mp Backfill&		stockpiles			
D Pit Highwall Mine Fluro 1/2/3 Rainbow 1/2/	RES TO	D BE REVEGE by Berms (map)	actual length (ft)	Du	mp Backfill&		stockpiles			
Pit Highwall Mine Fluro 1/2/3	RES TO	D BE REVEGE by Berms (map) 35 22	actual length (ft)	Du	mp Backfill&		stockpiles			
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DOZING			- B			
Dump Top Rounding & Topsoil Spreading		Ripping		Seed Setting with D-9 pulling Dimpler		
D-9	70' Push	D-9		D-9		
Production				Production		
Dozing distance	70	Ripper width (ft)	10.0	Dippler width (ft)	11.0	
Maximum production(lcy/hr)	1600	Ripper penetration (ft)	2	speed (mi/hr)	1.00	
		speed (mi/hr)	1.00			
Correction Factors						
Operator	0.75	Maximum production(ac/hr)	1.21	Maximum production(ac/hr)	1.33	
efficiency (50 min/hr)	0.83	Correction Factors		Correction Factors		
		Operator	0.75	Operator	0.75	
Total Correction Factor	0.623	efficiency (50 min/hr)	0.83	efficiency (50 min/hr)	0.83	
Corrected Production	TOTAL ACTUAL	Total Correction Factor	0.623	Total Correction Factor	0.623	
(lcy/hr)	996					
		Corrected Production	0.75	Corrected Production	0.83	
	Contract Physics	(ac/hr)		(ac/hr)		

SCRAPERS	1		
Top Soil Replacement			
Cat 631			
Capacity (cu yd)		29	Dept.
Average Haul Distance		1700	
Cycle Time		27	
Loading time (min)	Thusains.	0.9	
Spreading time (min)		0.7	
Loaded Haul time (min)	4% grade	1.3	
Empty Haul time (min)	4% grade	0.9	
Cycle Time (min		3.7	
Cycles per Hour		16.2	
Production Rate (lcy/hr)		470	
Correction Factors			
Operator		0.75	
Job Efficiency(50 min/hr)		0.83	
Load Factor		0.8	
Total Correction Factor		0.50	
Corrected production rate(cy/hr)		234	

SCRAPERS			
Waste Rock Cap for Landfill	18,75	The state of the s	
Cat 631	F 899 3	. 10.1	
Capacity (cu yd)		29	The second second
Average Haul Distance		1300	
Cycle Time			
Loading time (min)		0.9	
Spreading time (min)		0.7	
Loaded Haul time (min)	4% grade	1.0	
Empty Haul time (min)	4% grade	0.7	
Cycle Time (min	72.00	3.3	
Cycles per Hour		18	
Production Rate (lcy/hr)		527	
Correction Factors			
Operator		0.75	
Job Efficiency(50 min/hr)		0.83	
Load Factor		0.8	
Total Correction Factor		0.50	
Corrected production rate(cy/hr)		263	

Equipmen	it Hourly F	Rates				
			L Company		Total Hou	rly
Item					Cost	
D9 Dozer						
Cat 631 G	Scraper			25	267.73	
Cat 992G I	ooder				324.85	
041 0020 [Jauei				475.40	
100						4.970
Total Hourl	y Costs fro	m Rental Ra	te Blue Boo	ok, 2006 per Do	OGM comp	nente
			Thirt is		JOIN COMM	lents
D			200			
Labor Hou	rly Rates	5 10.				177
Operator	Poss	FICA	Unemploy	Wkmn Comp		
Operator	Base	7.65%	3.00%	12.30%		Total (\$)
Scraper					Control of	
Dozer	1					55.40
Loader			de la			55.40
Haul Truck						55.40 43.30
	ly, T.					43.30
			F (%)		20	
				9.8		
Base labor r	ates are fro	om Means 20	006 per DO	GM comments		
					134	
Revegetation	n Seed C	ost per Acre				1. 1. 1. 1. 1. 1.
torogotatio	Jii Ocea Ci	JSI PEI ACIE			700	10000000000000000000000000000000000000
Species	100		lbs/acre	\$/lb	* 12	ħ
crested whe	atgrass		3.0	3.00		per acre 9.00
squirreltail	1600	132 A	2.0	35.00		70.00
ndian Riceg	rass	100	2.0	6.00		12.00
Yellow Swee	tclover		0.5	2.00		1.00
Black Sage			0.1	100.00	100	10.00
Palmer's Per			1.0	60.00		60.00
Four-wing Sa Shadscale	aitbrush		1.0	12.00		12.00
Jilauscale			1.0	18.00	Y. W.	18.00
	1 531		10.6			100.00
Seed Costs f	rom Granit	e Seed, Lehi	1U.0	(00)		192.00

9.0 SURETY

BRI proposes to provide reclamation surety for the reclamation liability that currently remains from past operations and for the disturbances and resultant liabilities anticipated to be incurred during Phase I of LMU development.

9.1 Baseline Reclamation Liability

BRI has carefully mapped existing disturbances using 1976, 1986 and 2001 aerial photographs and topographic mapping to determine the advancement of disturbances and their aerial extent. In turn, the disturbances have been classified by disturbance: pits, waste rock dumps and pit backfills, ore stockpiles, and ancillary facilities.

The current status of reclamation at the mine is summarized on the map entitled Disturbed Acres Status of Properties Existing & Released (Plate 12). Five categories are shown on the map:

- pit, dump, ore pad, mine camp and other disturbances subject to reclamation liability;
- pit and dump disturbances varianced in the 1988 revision;
- pit, dump, backfill and other disturbances released or varianced between 1988 and 2000;
- pit disturbances requested for variance in the updated revision;
- reclamation treatment test plots.

The disturbed areas for which there is no further reclamation liability are the following: Taurus pit and dump, Sigma Emma pit and dump, Roadside 1 and 2 pits and associated dumps, the Fluro pit and dump, the former Anaconda pit and dump located in the vicinity of the Monitor deposit, the Monitor dump, the Rainbow pit (part) and dump, the Anaconda pit and dump located adjacent to Rainbow pit, and the Blue Chalk dumps and pit backfills. Table 4.2-1 lists the dates that these pits and dumps were opened and closed. These disturbed areas have either been released from surety requirements after the Division had determined that adequate revegetation success had

been achieved or were granted a variance at the time the initial MRP was approved in 1988.

Table 9.1-1 summarizes the disturbed areas having current outstanding reclamation liabilities at the Topaz mine along with their areas (acreages) and proposed disposition.

Table 9.1-1 Current (end 2004) Outstanding Unreclaimed Areas

Disturbance Area Designation	Disturbed Area (acres)	Disposition	Anticipated Timing	
Monitor Pit Backfill Surface	27.2	Rip, topsoil, revegetate	Beginning in Phase I	
Monitor Ore Pad	13.4	Rip, topsoil, revegetate	End of Monitor pit life	
Dust Suppression water assembly (southwest of Monitor)	assembly (southwest of 1.9 Rip, revege		Post Phase I	
Roadside 2 Pit Backfill Surface	e 1.0 topsoil, revegetate		Begins in Phase I	
Roadside/Fluro 3 Pit Backfill Surface	16 0 tonsoil revenetate		Begins in Phase I	
Landfill	7.7	Cover, topsoil, revegetate	End of mine life	
Mine Camp	8.6	Rip/scarify, revegetate	End of mine life	
Laydown area on Fluro dump	4.6	Rip/scarify, topsoil, revegetate	End of mine life	
Rainbow Pit 2 borrow, ore pad, ramps	21.6	Regrade, rip, topsoil, revegetate	Post Phase I	
Blue Chalk North Pits 23.3		Variance from Rule R647-4-111.7, 12, & 13 requested	Not scheduled	
Blue Chalk South Pit	Pit 8.4 Variance from Rule R647-4-111.7 , 12, & 13 requested		Not scheduled	
Section 16 North 1 Pit	25.7	Variance from Rule R647-4-111.7, 12, & 13 requested	Not scheduled	
Section 16 North 1 Dump	26.4	Rip/scarify, topsoil, revegetate	Post Phase I	
Total Current Disturbed Area	195.7			

As part of this revised MRP, BRI is seeking a variance for reclamation of the Blue Chalk North, Blue Chalk South, and Section 16 North No. 1 open pits. These pits must remain open, as they are today, to allow access to the Blue Chalk North and South and Section 16 ore bodies in the future. These open pits will be expanded in future phases of Topaz mine operations and backfill opportunities will be determined in future phase amendments.

The surety amounts for the currently disturbed areas subject to reclamation have been calculated using the same methods used for new disturbances to be created in the initial LMUs in the first phase of mining proposed in this plan. In this way the allocation of existing surety, whether for disturbances that are bonded or for formerly proposed developments that have not yet begun, is not relevant. Rather, the existing surety amount would be adjusted as necessary to provide sufficient surety for the currently outstanding reclamation liability as well as the reclamation liability anticipated to be accrued during the development and mining of the Phase I LMUs.

The reclamation cost estimate for the existing disturbances is provided in Appendix 7 and the reclamation cost estimate for the proposed disturbances under the Phase I LMU is in Appendix 8.

9.2 Methodology

This paragraph will describe how the Reclamation Plan Cost Estimate was accomplished. Separate estimates for reclamation of existing and proposed Phase I LMU disturbances, comprised of five pages each (or worksheets in MS Excel), are provided in Appendices 7 and 8. The description below explains where data originated and how it was utilized in the various calculations. The following subsections pertain to the reclamation cost estimates for the existing and proposed Phase I LMU disturbances.

9.2.1 Rates

This worksheet tabulates first the Equipment Hourly Rates, which include all the operating, ownership, and overhead costs extracted from the Rental Rate Blue Book, last half 2006. The Labor Hourly Rates were obtained from Means Heavy Construction Cost Data, 2006. Finally, the Revegetation Seed Cost per Acre table was derived using the revegetation species and seed application rates in Table 7.11-1. The unit seed price was obtained from Granite Seed Company, Lehi, UT on 8/14/06.

9.2.2 Equipment

This worksheet tabulates the calculated production rates for each of the unit operations (i.e. dump top rounding with a dozer, ripping with a dozer, seed setting with a dozer pulling the dimpler, and a scraper replacing topsoil). Dozing distance for the dump top rounding was assumed to be 70 feet per BRI. The average haul distance used for the scraper topsoil replacement productivity originated in the Quantities sheet to be explained in the next paragraph. All other factors on this worksheet were obtained from the Caterpillar Performance Handbook, 36th Edition, April 2006.

9.2.3 Quantities

This worksheet lists and summarizes the applicable quantities needed for the ensuing cost calculations by subsection number (e.g., 9.3 Facilities Demolition, 9.4 Regrading and Recontouring, etc). BRI provided building dimensions and linear feet of dump margin for dump top rounding. All other quantities were listed in Section 7.0 or measured from the associated sets of drawings.

9.2.4 Costs

This sheet details by paragraph how the costs are calculated. Generally the number of units (e.g., cubic yards, etc.), the productivity (e.g., cubic yards/ hr), the equipment and labor cost per hour are combined to determine the cost for a given item. In most cases, items used in this sheet are linked to the quantities, equipment, and rates sheets. When this was not the case, a reference was listed from Means Heavy Construction Cost Data, 2006 by line number; or the DOGM rate sheet. The most recent available DOGM rate sheet is dated April 18, 2005.

9.2.5 Cost Summary

This sheet lists the total cost for each reclamation component which add up to the "Reclamation Total". The standard DOGM add-ons are then determined and listed, after which the "Grand Total" for the estimate is summed.

9.3 Facilities Demolition & Disposal

The plans for facilities demolition and disposal of the demolition debris are described in Section 7.2. The reclamation cost estimate for this component is included with the costs for existing disturbances in Appendix 7.

9.4 Regrading & Recontouring

Regrading and contouring of waste rock dumps and pit backfills, ancillary facilities sites (e.g., mine camp,), ore stockpile sites, and the landfill are discussed in Section 7.4.

9.5 Ripping

Ripping of roads is described in Section 7.3. Ripping of other hardened surfaces such as dump surfaces and ore stockpile sites is discussed in Section 7.4.

9.6 Drainage Stabilization & Restoration

Drainage and sediment control will not be required as part of Phase I reclamation. Refer to section 7.5 and also sections 3.6, 4.8, 5.7, and 6.4.

9.7 Soil Replacement

Topsoil replacement methods are described in section 7.7.

9.8 Seedbed Preparation

Seedbed preparation methods are also described in Section 7.8.

9.9 Revegetation

Revegetation methods are described in Section 7.10.

9.10 Pit Highwall Safety Berms & Fences

Pit highwall safety berms are constructed prior to beginning mining of each open pit or pit expansion; therefore they are not reclamation costs. No fences are proposed as part of the reclamation plan.

9.11 Miscellaneous

Miscellaneous costs consist of mobilization and demobilization costs, which are included with the cost estimate for Phase I LMU reclamation (Appendix 8), and landfill

reclamation costs, which are included in the Existing facilities reclamation cost (Appendix 7). For reclamation cost estimating purposes it has been assumed that a the existing and proposed disturbances would be carried out as part of a single operation; therefore, mobilization and demobilization costs would not be incurred separately for reclamation of existing and proposed disturbances.

9.12 Construction Supervision

Supervision of reclamation construction is estimated at 10 percent of the Reclamation Total cost for both existing and proposed disturbances.

9.13 Contingency and Escalation

A cost contingency factor of 10 percent of the sum of the Reclamation Total cost plus construction supervision was included with the cost estimates for both existing and proposed disturbances. A cost escalation factor of 1.6 percent per year, compounded annually for 5 years, was added to the cost estimates for reclamation of both existing and proposed disturbances.

9.14 Summary of Reclamation Costs

The reclamation cost estimates for existing and proposed Phase I LMU disturbances, including construction supervision, contingency, and escalation are \$724,600 and \$637,400, respectively.